IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

TERRY ADIRIM, M.D.,)
Plaintiff,)
v.) Case No. 25-768
U.S. CENTRAL INTELLIGENCE AGENCY, et al.)))
Defendants.)

PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER

- 1. Pursuant to Fed. R. Civ. P 65(b), Plaintiff Terry Adirim moves for a temporary restraining order enjoining Defendants the U.S. Central Intelligence Agency ("CIA") and the Hon. John Ratcliffe from terminating Plaintiff's employment until further order of this Court.
- 2. As detailed in the accompanying Memorandum of Law, Plaintiff expects Defendants CIA and Ratcliffe to terminate her on May 3, 2025, one month short of when Plaintiff would qualify for full federal retirement benefits, causing her immediate and irreparable harm.

WHEREFORE, Plaintiff respectfully requests that the Court enter a temporary restraining order against Defendants CIA and Ratcliffe to prevent them from terminating Plaintiff's employment until further order of this Court, as set forth in the attached proposed Order.

Dated: May 2, 2025 Respectfully submitted,

/s/ Kevin T. Carroll

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Attorney for Plaintiff

I hereby certify that on May 2, 2025, a copy of the foregoing was mailed first class mail,

postage prepaid, to:

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> /s/ Kevin T. Carroll Kevin T. Carroll, Esq.